



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

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JAN 22 2008

Ref: Ref: EPR-N

Catherine Kahlow  
United States Forest Service  
WSR Team Lead  
Post Office Box 68  
Kamas, Utah 84036

Re: Wild and Scenic River Suitability Study for  
National Forest Systems Lands in Utah Draft  
Environmental Impact Statement (DEIS)

Dear Ms. Kahlow:

The Environmental Protection Agency (EPA) Region 8 has reviewed the Draft Environmental Impact Statement (DEIS) for the Wild and Scenic River Suitability Study for National Forest Systems Lands in Utah. In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. 4371 *et seq.* and the Clean Air Act §309, 42 U.S.C. 7609, EPA offers the following comments for your consideration.

With this DEIS, the US Forest Service (USFS) proposes to assess whether or not eligible river segments should be recommended to Congress for inclusions in the National Wild and Scenic River Systems (NWSRS). As stated in the DEIS, the motivation for the USFS to complete this action is the desire of the State of Utah and a number of counties to complete the suitability step of the wild and scenic river analysis. Approximately 840 river miles in Utah are now protected under these interim measures. Once this Record of Decision (ROD) is issued, the preliminary recommendation for wild and scenic designation will be forwarded to the Chief of the Forest Service, Secretary of Agriculture and President of the United States for possible modifications. A final recommendation would be then made to Congress for final decisions on designation of rivers as part of the National Wild and Scenic River System. Those river segments not selected for wild and scenic protection by Congress would no longer be protected under the existing interim measures. The rivers under study are located on the Ashley, Dixie, Fishlake, Manti-La Sal, Uinta, and Wasatch-Cache National Forest within the State of Utah.

In EPA's review of the DEIS we would like to commend the USFS in the preparation of a well thought-out and organized NEPA document. It was easy to understand how the USFS developed its range of alternatives that would be evaluated in detail in the DEIS and why other



alternatives proposed were eliminated from further study. The evaluation of each river segment was clearly laid out and easy to understand. We do have some comments on what we would like to see in the FEIS that would help make the document more informative. The following are areas that we believe could be expanded:

#### Alternative Impact Analysis:

The DEIS has evaluated in detail six alternatives. In our review of the DEIS document, EPA had some difficulty in determining which alternative could be the environmentally preferred alternative. It appears in the DEIS that between the action alternatives 3, 4, 5 and 6; alternatives 5 would be the most protective of the river ecosystems since it would place the largest amount of river miles under the NWSRS. However, under alternative 5, 310 river miles would not be placed under the NWSRS and would lose their interim protection and management under FSH 1909.12, Chapter 80 – Wild and Scenic River Evaluation. In looking at the Alternative 1 the DEIS's No Action alternative, suitability would be deferred on all 840 mile that have been determined to be suitable for designation in the NWSRS. This would mean that all 840 miles designated as eligible for NWSRS would still have interim protection. EPA would like to see the FEIS evaluate which alternative; alternative 1 or alternative 5 would be the environmental preferred alternative and include this evaluation in the FEIS.

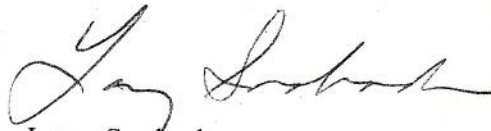
In addition, it is unclear in the DEIS what would be the environmental consequences in removing river segments from interim protection. The FEIS should include some form of evaluation for each alternative on what would be the environmental impacts in removing interim protection from river segment proposed in that alternative.

#### EPA's Rating

EPA has a responsibility to provide an independent review and evaluation of the potential environmental impacts associated with this DEIS. Based on the procedures EPA uses to evaluate the adequacy of the information and potential impacts of the Preferred Alternative, EPA is rating the DEIS as Environmental Concerns- Inadequate Information, "EC-1." "EC" signifies that EPA's review of this Draft EIS has identified environmental impacts that should be avoided in order to fully protect the environment. A "1" rating signifies that the DEIS adequately sets forth the environmental impacts of the preferred alternative and those of the alternatives reasonably available to the project; no further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information

We appreciate the opportunity to comment on the DEIS. If you have any questions or would like to discuss our comments, please contact Dick Clark of my staff at (303) 312-6748 or by email at [clark.richard@epa.gov](mailto:clark.richard@epa.gov).

Sincerely,



Larry Svoboda  
Director, NEPA Program  
Office of Ecosystems Protection and  
Remediation

enclosure

